

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

In re: Dustin Wagner and Tara Wagner, : Case 16-18611  
:   
Debtors. : Chapter 13

CERTIFICATION OF NO ANSWER

I, Barton Knochenmus, Esq., counsel for the captioned Chapter 13 Debtors, hereby certify that no Answers, Objections, Responsive Pleadings, or Requests for Hearing have been filed or served in response to Debtors' Motion to Avoid Judicial Lien within fourteen (14) days as required by Local Rule 9014-3( i ) governing motions and answers, and served upon:

American Express Bank FSB  
4315 S 2700 West  
Salt Lake City UT 84148

American Express Bank FSB  
c/o Zwicker & Assoc  
3220 Tillman Dr Ste 215  
Bensalem PA 19020

American Express  
PO Box 1270  
Newark NJ 07101-1270

American Express  
PO Box 981535  
El Paso TX 79998-1535

Dustin/Tara Wagner  
3207 Woodlea Rd  
Orefield PA 18069-2436

Office of the US Trustee  
833 Chestnut Street Suite 500  
Philadelphia PA 19107

Pursuant to Local Rule 9014-3 ( j ), Debtors now respectfully request their proposed Order be granted.

By: /s/ Barton Knochenmus, Esq.  
Barton Knochenmus, Esq.  
Attorney for Debtors  
1275 Glenlivet Drive Suite 100  
Allentown, Pennsylvania 18106-3107  
610-770-3575

Dated: August 31, 2017